

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AKJTAR KHAN

Plaintiff,

Index No. 12-CV-8462

v.

**STIPULATION EXTENDING
TIME TO ANSWER OR MOVE**

MIDLAND FUNDING, LLC
MIDLAND CREDIT MANAGEMENT, INC.,
PETER T. ROACH & ASSOCIATES, P.C.,
PETER T. ROACH, TIMOTHY MURTHA
RUBIN & ROTHMAN LLC
JOHN DOES #1-5

Defendant

It is hereby stipulated and agreed by and between Plaintiff, Akhtar Khan, and Defendants, Peter T. Roach & Associates, P.C., Peter T. Roach, and Timothy Murtha, acting through their duly authorized counsel, that the time for Defendants Peter T. Roach & Associates, P.C., Peter T. Roach, and Timothy Murtha's to answer or otherwise respond to the Plaintiff's Complaint is hereby extended until **December 31, 2012**.

The answer is currently due December 17, 2012.

There has been no prior request for an extension of time in this action and no other scheduled deadline is affected by this request.

Defendant Peter T. Roach & Associates, P.C., Peter T. Roach, and Timothy Murtha hereby waive jurisdictional defenses, including defenses based on any claim(s) of improper service.

Dated: March 15, 2012
New York, New York

THE LAW OFFICE OF AHMAD KESHAVARZ ELTMAN, ELTMAN & COOPER, P.C.

By: /s/ Ahmad Keshavarz
Ahmad Keshavarz
16 Court Street, 26th Floor
Brooklyn, NY 11241-1026
(718) 522-7900

By: /s/ Anthony S. Poulin
Anthony S. Poulin, Esq.
20 Vesey Street, Suite 1406
New York, NY 10007
(212) 660-3100

Fax: (877)496-7809-6682
Attorneys for Plaintiff Akhtar Khan

Fax: (212) 660-3101
Attorneys for Defendants Peter T. Roach & Associates, P.C.,
Peter T. Roach, and Timothy Murtha